



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

REC'D TN
REGULATORY AUTH.
Guy M. Hicks
General Counsel
'02 FEB 12 PM 1:56
OFFICE OF
EXECUTIVE SECRETARY
615 214 6301
Fax 615 214 7406

February 12, 2002

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with State
and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

This is to notify the Authority and parties that BellSouth expects to file the flow-through report and supporting documentation regarding Interrogatory No. 36 on Thursday, February 21, 2002. If this expected filing date changes, BellSouth will notify the Authority and parties immediately.

As indicated during the discussion in the agenda conference on February 5, 2002, the data for February 2001 is not expected to be available. We will file an explanation of the reasons for that at the time of the filing.

At the agenda on February 5, Director Greer indicated that he expected BellSouth's work papers to be filed with the response to Interrogatory No. 36. Director Greer indicated that he wanted this done so that no further discovery would be necessary in order to address BellSouth's response. If it was Director Greer's intent that the Authority's staff would be able to replicate the results that BellSouth will file, there are some issues that need to be addressed, so that we will know how to proceed.

David Waddell, Executive Secretary
February 12, 2002
Page 2

According to BellSouth's experts in this area, reports like this are prepared by running special software programs against specific databases. In the case at hand, the database will span approximately 12 to 15 DLT-type computer tapes (roughly 636 to 795 standard CDs). Furthermore, in order to run the programs against the databases, specific additional kinds of software are required, software that BellSouth has, but that has only been tested on the specific kind of hardware platform BellSouth currently uses for this work. In other words, the software necessary to run these programs has only been used and tested with the specific types of computers that BellSouth utilizes.

To be more specific, our experts inform us that the database platform is Informix, and the code is written in a legacy language called Informix-4GL. This code and database run on a Sun 16CPU 8GB RAM Model E6000. To read the database tapes, a DLT-compatible drive technology is required, and the Informix's database loader programs are required. The Authority has not specified specific file formats for this data, so we are planning to provide this data using the native file formats used by the database software and platform, unless otherwise directed.

I realize that I am providing some very detailed information here, and we will be happy to have our information technology personnel discuss the specifics with the TRA's staff or information technology personnel. My point in raising this now, however, is to respectfully request that if the TRA does not intend, or cannot run the program or programs because of hardware and software limitations in the systems you have available, that you excuse us from copying the database in question to tape, which takes some time and is somewhat expensive.

These data tapes, by the way, if produced will contain all of the information BellSouth has received from all the LSRs submitted to BellSouth by CLECs across the region. Consequently, we expect that the other CLECs in the region would object to AT&T and SECCA having this CLEC-specific information. We therefore respectfully request that the TRA provide direction to BellSouth in this regard as well. To put a point on the matter, BellSouth does not believe that it should turn this CLEC-specific database over to AT&T and SECCA unless the TRA directs us to do so, in which case we will be happy to comply.

Other than these issues, we are collecting the information that reflects what our people have done (and continue to do, as we are not finished with the project)

David Waddell, Executive Secretary
February 12, 2002
Page 3

to obtain this information for the TRA and we will provide that to the TRA and the other parties in this proceeding.

A copy of this letter is being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Michael A. Hopkins
McKenna & Cuneo
1900 "K" St, NW
Washington, DC 20006
mike_hopkins@mckennacuneo.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
james.b.wright@mail.sprint.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
don.baltimore@farrar-bates.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202
timothy.phillips@state.tn.us.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farris-law.com

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Jack Robinson, Esquire
Gullett, Sanford, Robinson & Martin
230 Fourth Ave., N., 3d Fl.
Nashville, TN 37219-8888
jrobinsonjr@gsrcm.com

Terry Monroe
Competitive Telecom Assoc.
1900 M St., NW, #800
Washington, DC 20036
tmonroe@comptel.org

